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February 3, 2022

**VIA ECF**

Honorable Mary K. Vyskocil  
United States District Judge  
Southern District of New York  
500 Pearl St.  
New York, NY 10007

**Re: Sara Costantino v. City of New York, et al., 21 CV 7248 (MKV)**

Your Honor:

I am a Senior Counsel in the office of Georgia M. Pestana, Corporation Counsel of the City of New York, representing defendants City of New York and P.O. Carrasquillo (hereinafter, "City defendants") in the above-referenced matter. The parties write to jointly request an adjournment of the initial conference currently scheduled for February 22, 2022 at 10:00 a.m., until a date to be determined, following the conclusion of the parties' participation in Local Civil Rule 83.10 (formerly known as, and herein referred to as, the "Plan").

Per docket entry dated August 30, 2021 the above-referenced case was designated for participation in the Plan. The Plan is a comprehensive case management plan that automatically governs the pretrial phase of cases brought pursuant to § 1983 – such as the case at bar -- in this District pursuant to Local Civil Rule 83.10. One purpose of the Plan is to increase efficiencies in certain categories of Section 1983 cases by mandating early disclosures of categories of documents and directing the parties to early mediation. Indeed, the Plan was designed to help efficiently manage and reduce the time of the disposition in the typical Section 1983 cases brought against the NYPD and its officers. See Elliot v. City of N.Y., 2020 U.S. Dist. LEXIS 216028 (S.D.N.Y. Nov. 18, 2020) (explaining the history and purpose of adopting Local Civil Rule 83.10). Moreover, per docket entries dated January 31, 2022, the parties have been noticed for mediation pursuant to the Plan, and anticipate that in short order, a mediation will be scheduled.

Based on the foregoing, the parties respectfully request that the initial conference be adjourned until a date after the parties' mediation, following their participation in the Plan, provided that the parties do not resolve this matter in its entirety via mediation. Upon

information and belief, this adjournment will not affect any other scheduled dates in this litigation.

Thank you for your time and consideration.

Respectfully submitted,


/s/

Daniel M. Braun  
Senior Counsel

CC: Scott A. Korenbaum, Esq. (BY ECF)

**GRANTED. The initial pretrial conference scheduled for February 22, 2022 at 10:00 AM is ADJOURNED to June 14, 2022 at 10:00 AM. SO ORDERED.**

Date: 2/7/2022  
New York, New York

  
Mary Kay Vyskocil  
United States District Judge